

DOCKET FILE COPY ORIGINAL

JUN 29 1993

FCC - MAIL ROOM

RECEIVED

JUN 29 1993

Office of the Secretary
Federal Communications Commission
Washington, DC 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

This is a letter of comment regarding the Notice of Proposed Rulemaking, RM 8013 docket number 93-61, regarding Automatic Vehicle Monitoring systems.

CliniCom is a leading provider of hospital clinical information systems. A wireless portable terminal, manufactured and designed by CliniCom, is an integral component of the hospital information system. It is used by the hospital's medical staff to instantly enter and view vital patient information. CliniCom has an installed base of about 3000 terminals. The wireless portion of the terminal is an embedded 902-928MHz spread spectrum part 15 modem.

In 1985, The FCC opened the 902-928MHz band to promote commercial development of spread spectrum technology by allowing unlicensed use of the ISM bands. CliniCom, along with numerous additional companies, invested heavily in developing a spread spectrum radio in the 900 MHz Part 15 band. The success of the radio (wireless terminal) is due, in part, to the efficient spectrum utilization granted by the FCC.

The proposed Automatic Vehicle Monitoring (AVM) systems and Location Monitoring Systems (LMS) in the part 90 rules undermine the efficient spectrum usage defined in the part 15 rules. Part 15 users stand to be shut down in two directions; AVM users have the right to shut down any interfering part 15 users, and, radios under part 15 may not be able to compete with the high power inefficient use of the spectrum proposed in the part 90 rules.

Although, a strong legal basis for allowing AVM and LMS exists, the
~~ECG must consider the best interests of all involved. Mon-~~



CliniCom, on behalf of its customers and other spread spectrum users and developers, respectfully urges the FCC to decline the NPRM and continue to encourage development of more spectrally efficient technologies. We believe that Spread Spectrum is one such technology and should be allowed to grow.

Sincerely,

Guy S. Kirchhoff
Hardware Engineering Manager